

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTHONY UVARI,

Defendant.

Case No. 2:18-cr-253-APG-NJK

Protective Order

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, United States Attorney, and Eric C. Schmale, Assistant United States Attorney, counsel for the Government, and Kathryn C. Newman, Assistant Federal Public Defender, counsel for Defendant Anthony Uvari, that this Court issue this Protective Order, which (as outlined herein) protects from disclosure to the public any discovery documents containing certain tax records.

In support of this Stipulation, the parties state and agree as follows:

1. As used herein, the term Protected Documents refers to all tax records in the discovery other than: (1) the Defendant's individual tax records; (2) corporate tax records for AUF, LLC; and (3) corporate tax records for A&S, LLC.

1 2. Given the nature of the charges against the Defendant, the potential defenses,
2 and the possible witnesses, the defense team requires access to the Protected Documents.
3 Because of the sensitive nature of tax records, the parties agree to abide by the conditions in
4 this Protective Order.

5 3. The Government will provide counsel for Defendant a binder containing a
6 printed copy of the Protected Documents. That binder and each Protected Document will
7 be clearly marked as subject to this Protective Order.

8 4. Access to Protected Documents will be restricted to the attorneys of record
9 (and their paralegals, investigators, experts, secretaries, file clerks, law clerks, contractors,
10 vendors, IT Department, and copy centers employed by the attorneys of record or
11 performing work on behalf of the Defendant) and any person authorized by the Court
12 (hereinafter referred to collectively as Authorized Persons). The defendant is not an
13 Authorized Person.

14 5. Unless ordered by the Court, an Authorized Person shall not:
15 a. make copies of any Protected Document (or permit copies to be made)
16 for any person that is not an Authorized Person;
17 b. allow any person who is not an Authorized Person or the defendant to
18 read any Protected Document;
19 c. disclose any Protected Document (or the content of any Protected
20 Document) to any person who is not an Authorized Person or the defendant; and
21 d. use any Protected Document for any purpose other than preparing to
22 prosecute or defend against the charges in the indictment or any further superseding
23 indictment arising out of this case.
24

6. Any Authorized Person disclosing Protected Documents to another Authorized Person pursuant to this Protective Order or any other Court Order must notify them of the existence and terms of this Protective Order.

7. The restrictions herein shall not restrict the use, copying, or introduction of any Protected Document as evidence during any hearing or trial of this matter.

8. Within a reasonable time after conclusion of this action (not to exceed 30 days after the last appeal is final), counsel for the Defendant shall return to the Government the binder of Protected Documents.

DATED this 5th day of March 2021.

Respectfully submitted,

NICHOLAS A. TRUTANICH
United States Attorney

/s/Kathryn Newman
KATHRYN C. NEWMAN
Assistant Federal Public Defender
Counsel for Defendant
Anthony Uvari

/s/ Eric Schmale
ERIC C. SCHMALE
Assistant United States Attorney

ORDER

IT IS SO ORDERED this 8th day of March, 2021.



HONORABLE NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE